

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

**(1) PINNACLE PACKAGING COMPANY, INC.,**  
an Oklahoma corporation,  
**(2) POLO ROAD LEASING, LLC,**  
an Oklahoma limited liability company, and  
**(3) J. SCOTT DICKMAN,**

Plaintiffs,

v.

Case No. 12-CV-537-JED-TLW

**(1) ONE EQUITY PARTNERS LLC,**  
a Delaware limited liability company,  
**(2) ONE EQUITY PARTNERS (EUROPE) GmbH,**  
and  
**(3) CONSTANTIA FLEXIBLES GmbH,**  
an Austrian corporation,

Defendants.

**DEFENDANTS ONE EQUITY PARTNERS LLC, ONE EQUITY PARTNERS  
(EUROPE) GMBH, AND CONSTANTIA FLEXIBLES GMBH'S  
UNOPPOSED MOTION TO FILE EXHIBIT UNDER SEAL**

Defendants One Equity Partners LLC, One Equity Partners (Europe) GmbH, and  
Constantia Flexibles GmbH respectfully move this Court for an order granting leave to file  
an exhibit to their Motion to Dismiss under seal.

1. Defendants must file answers, motions, or other responses to Plaintiffs' Amended Complaint by July 26, 2013. [Dkt 44]. Defendants intend to file a Motion to Dismiss by July 26, 2013.
2. As part of their Motion to Dismiss, Defendants intend to use as an exhibit a July 9, 2012 letter agreement between Plaintiff Pinnacle Packaging Company, Inc. and Centre Lane Partners, LLC ("July LOI").
3. The July LOI is referenced in and integral to the Amended Complaint, but is not attached thereto.

4. Counsel for Defendants has communicated with counsel for Plaintiffs, and the parties believe this document is confidential as it contains confidential financial and business information related to the parties. In the interests of protecting the privacy and confidentiality of this information, Defendants request leave to file this exhibit under seal.<sup>1</sup> Counsel for Plaintiffs does not object to this motion for purposes of filing the subject document under seal.

WHEREFORE, Defendants request an order granting leave to file the described exhibit under seal as part of their Motion to Dismiss.

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<sup>1</sup> The parties have also discussed the need of a protective order in this case, and have begun review of Magistrate Wilson's standard form protective orders for application in this case.

Dated: 25 July 2013

s/ John D. Russell

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**COUNSEL FOR DEFENDANTS**  
**ONE EQUITY PARTNERS LLC, ONE**  
**EQUITY PARTNERS (EUROPE) GmbH,**  
**and CONSTANTIA FLEXIBLES GmbH**

### **CERTIFICATE OF SERVICE**

I hereby certify that on 25 July 2013, I electronically transmitted DEFENDANTS ONE EQUITY PARTNERS LLC, ONE EQUITY PARTNERS (EUROPE) GMBH, AND CONSTANTIA FLEXIBLES GMBH'S UNOPPOSED MOTION TO FILE EXHIBIT UNDER SEAL to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Laurence Lindsay Pinkerton – [pf@att.net](mailto:pf@att.net)

James David Jorgenson – [pf@att.net](mailto:pf@att.net)

**COUNSEL FOR PLAINTIFFS**

s/John D. Russell

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